

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

IN RE:)	Case No: BK 11-82482
)	
)	CHAPTER 9
SANITARY AND IMPROVEMENT DISTRICT)	
NO. 513 OF DOUGLAS COUNTY,)	MOTION TO LIMIT PUBLICATION OF
NEBRASKA)	NOTICE
)	
)	
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)	

The Debtor hereby moves the Court that publication of the Notice of Bankruptcy in this case be required only in the Omaha World Herald and the Lincoln Journal Star newspapers. In support of this request, the Debtor states as follows:

1. The Debtor is a sanitary and improvement district created under the laws of the State of Nebraska as a municipality.
2. Section 923 of the United States Bankruptcy Code requires publication of notice of a Chapter 9 bankruptcy.
3. Nebraska Rule of Bankruptcy Procedure 2080-1.B.1. states that "unless otherwise requested by the debtor in the petition and ordered by the Court after notice and hearing" that publication shall be made in The Wall Street Journal, Lincoln Journal Star and Omaha World-Herald.
4. The Debtor has solicited and received from seventy two and one-half (72.5%) percent of the Creditors a Ballot accepting the Plan of Adjustment and Disclosure Statement and the Debtor has not received any votes disapproving the Plan from

any creditors who would be impaired by the Plan of Adjustment.

5. The cost of publication in The Wall Street Journal would be a significant and unwarranted expense for the Debtor and unnecessarily expend funds that would otherwise be payable to the creditors.

WHEREFORE, the Debtor requests that the Court permit notice and a hearing on the issue of limited publication prior to the entry of the Chapter 9 notice provided in Rule 2080-1A.1.a.

SANITARY AND IMPROVEMENT
DISTRICT NO. 513 OF DOUGLAS
COUNTY, NEBRASKA,

Dated this 30th day of September 2011.

By: /s/Brian C. Doyle

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